

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 23-cr-68

HUSSEIN HAJI,

Defendant.

GOVERNMENT’S MOTION FOR ORDER OF DETENTION

The United States of America, by and through its attorneys, Gregory J. Haanstad, United States Attorney for the Eastern District of Wisconsin, and Abbey M. Marzick, Assistant United States Attorney for said district, hereby respectfully submits this written motion to supplement the record from the arraignment and detention hearing that took place on April 27, 2023, before the Honorable Magistrate Judge Nancy Joseph. For the reasons that follow, the government is seeking detention of defendant Haji because he is a danger to the community.

I. Procedural Background

On April 11, 2023, a federal Grand Jury in the Eastern District of Wisconsin returned a two-count indictment against Haji. Count One alleges a violation of Hobbs Act Robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2(a), for Haji’s robbery of a United States letter carrier. Count Two alleges a violation of brandishing a firearm during a crime of violence, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2(a). Count Two carries a mandatory minimum of seven years up to life in prison, consecutive to any other sentence.

At the time of the indictment, the defendant was in state custody on a criminal complaint in Milwaukee County Circuit Court Case Number 2023CF00435. The state case charged the same armed robbery in the instant indictment. The state criminal complaint was filed on February 2, 2023. Cash bail was set at \$30,000. On March 22, 2023, a bail hearing was held on the state case and the cash bail was reduced to \$20,000. The defendant did not post the \$20,000 and remained in state custody until the state case was dismissed on April 26, 2023, due to the federal indictment. The defendant was then promptly brought to federal court on April 27, 2023, for his arraignment on the indictment.

At the arraignment, the defendant entered not guilty pleas on both counts of the indictment. The government argued for detention and the defendant argued for release on bond conditions. Judge Joseph ordered the defendant “temporarily detained” pending a complete bond study and adjourned the case until April 28, 2023, at 2:00 p.m.

II. There is a presumption for detention under § 3142(e)(3).

A rebuttable presumption for detention under Title 18, United States Code, Section 3142(e)(3) applies in this case based upon the 924(c) charge in Count Two. Therefore, there is a rebuttable presumption that no condition or combination of conditions will reasonably assure the safety of any other person and the community if the defendant is released.

III. Defendant Haji’s armed robbery of a United States letter carrier and the weight of the evidence supporting the charges reflect clear and convincing evidence that Haji is a danger to the community.

In recent months, a pandemic of armed robberies of U.S. letter carriers has wreaked havoc on the Milwaukee community.¹ Since October of 2022, the Milwaukee Police Department (MPD)

¹ “Push to Protect Milwaukee mail carriers grows after third armed robbery this year.” [2](https://www.yahoo.com/lifestyle/push-protect-milwaukee-mail-carriers-224748868.html?guccounter=1&guce_referrer=aHR0cHM6Ly93d3cuZ29vZ2xlLmNvbS8&guce_referrer_sig=AQAAAKr9F9zw9UY-fSjFSfwJDVluZU_XTZzcuuJL1fdKPSwMiyR9U8C0GsRnQw9B6V10LRp4UmwO4pefKp9mr2wxXmwBmXfClR1879ejtGxWheY04XHvYfp7Lcym0X6bRxu3OjWroPQOw30NDxvQKwP5P3XD3zcmGmyxE9fG9MonfC; “2</p></div><div data-bbox=)

and the Federal Bureau of Investigation (FBI) have been investigating a series of armed robberies of U.S. postal workers and mail thefts of mail collection boxes at U.S. post offices. These robberies occurred on October 25, 2022, November 18, 2022, December 7, 2022,² February 10, 2023, and March 13, 2023. They have ravaged the Milwaukee postal carriers' sense of security while they deliver mail in our community. In all but the October robbery, the robbery subjects brandished multiple firearms and pointed them in the faces of the mail carriers, in broad daylight. Arrow keys were stolen in each. Arrow keys are universal keys owned by the U.S. Postal Service and are able to open any locked mailbox at a U.S. post office. The investigation revealed that an organized crime group, self-proclaimed as the "Scamily," was responsible for most, if not all, of these robberies. Their mission is to: rob postal workers for their arrow keys while they work; steal mail from U.S. mail collection boxes; wash (with acetone) the stolen checks found in the stolen mail, and fraudulently cash the checks.

Haji is charged with the December 7, 2022 armed robbery, and the evidence of his involvement as a gunman during the robbery is overwhelming. During this robbery, the letter carrier was delivering mail on his normal daytime route when two masked male subjects, both carrying firearms, approached him on the 3200 block of North Bremen Street in Milwaukee. One of the subjects pointed a gun at the letter carrier and yelled, "Gimme everything! Gimme everything!" The letter carrier handed over his mail keys, which included his arrow key that had a unique serial number on it. The two subjects then fled on foot and the letter carrier ran into a local tavern to call 911.

Milwaukee letter carrier robberies preceded postal worker's murder." <https://www.fox6now.com/video/1154787>; "Concerns raised over safety of postal workers in light of armed robberies, attacks."

<https://news.wttw.com/2022/12/12/concerns-raised-over-safety-postal-workers-light-armed-robberies-attacks>;

² Although unrelated, a U.S. letter carrier was killed in Milwaukee on December 9, 2023, while delivering mail. See *United States v. McCaa, et. al.*, Eastern District of Wisconsin Case No. 23-CR-8-PP.

On January 27, 2023, law enforcement executed a search warrant at 2519 Buffum Avenue in Milwaukee, including the vehicles associated with the premises. GPS tracking of a vehicle and surveillance of the suspects led law enforcement to believe that the group used this home for their criminal activity. Numerous individuals were located and arrested at the location at the time of the execution of the search warrant, including Haji. MPD located a myriad of evidence, including but not limited to: (1) six firearms, including an AK-47 style rifle and multiple high-capacity magazines; (2) more than 900 stolen checks, from over 42 municipalities, totaling over \$550,000; (3) a large quantity of ammunition; (4) over \$6,000 in cash; (5) two postal arrow keys, including the key that was stolen during the December 7 robbery; (6) printed instructions on how to wash checks; (7) empty bottles of acetone; (8) checks in the process of being washed in acetone; (9) boxes of mail addressed to people not at that address; dozens of smart phones; (10) marijuana; and (11) numerous sweatshirts and apparel with the logo “Scamily” written on them. The getaway car, a white Nissan Murano, from the October 25 and December 7 robberies was parked outside the residence. Some photos of the evidence recovered are below:



Image 1: Arsenal of firearms and ammunition, stolen checks, U.S. currency, and check-washing products recovered from Buffum.

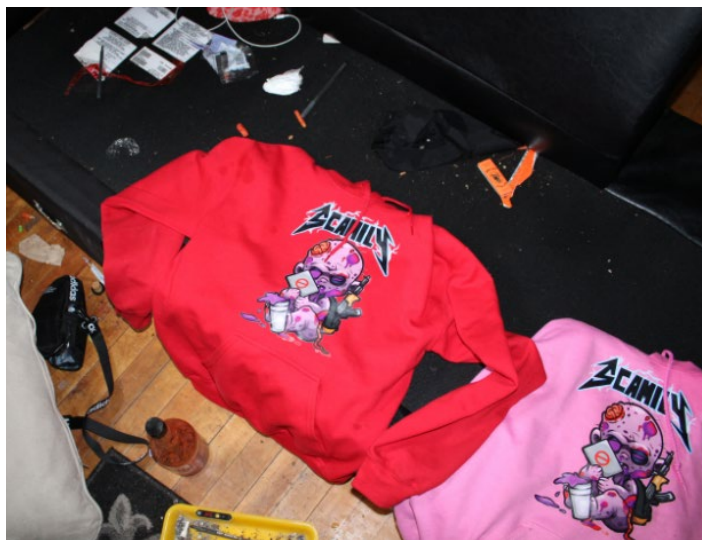


Image 2: Sweatshirts with the “Scamily” name and logo recovered from Buffum.



Image 3: Checks being “washed” as recovered during the search of the Buffum residence

At the time of the search warrant execution, Haji was located in another vehicle (Toyota Camry) parked at the Buffum residence, with another individual. A Glock 9mm firearm with an extended magazine (depicted in the photo of firearms above, front center) was found on the floorboard where Haji was sitting. Haji later provided a custodial statement to MPD detectives, after waiving his rights. Haji admitted to being one of the two gunmen in the December 7 armed robbery. He said he used the firearm recovered near him, the Glock 9mm with extended magazine, during the robbery. He told detectives that the goal of the robbery was to get the arrow key so that

the group could gain access to locked U.S. mail collection boxes. He explained the entire fraud scheme of the “Scamily” group: they stole mail from the mailboxes, opened the mail with the goal of finding checks, washed the checks, and then use the washed checks to obtain money fraudulently. Haji estimated that he had done about 40 “mail runs,” where he and co-actors stole mail from mail collection boxes. He also implicated co-actors in his statement, some of whom are in state custody and some of whom are not.

The weight of the evidence against Haji is extremely strong. *See* § 3142(g)(2). Two citizen witnesses saw the robbery of the mail carrier on December 7. Ring doorbell camera from a neighboring home captured the robbery. Haji was located outside the Buffum address when the search warrant was executed, where various pieces of evidence of the Scamily’s criminal activity were found alongside a small arsenal of firearms. Haji confessed to his involvement in the December robbery, both as one of the two gunmen, as well as to using the stolen arrow key approximately 40 times to steal more mail in order perpetuate the mail fraud and check-washing scheme.

Haji’s social media (Instagram and Facebook) link him to the Scamily crew. For instance, his Instagram name is “2900scamily.sain.” Photos of Haji brandishing firearms were found on social media and in the download of his cell phones. Below is one example of a photo recovered from Haji’s social media page:



Image 4: Photo recovered from Haji's social media page showing Haji (in red) holding a firearm while another individual poses with two guns.

Haji's cell phone was recovered at the time of his arrest and was forensically downloaded and analyzed, pursuant to a search warrant. Haji's phone was replete with photos of him with firearms, stacks of money, and checks. There were multiple photos of Haji and others "Scamily" apparel. A small sampling of the photos recovered from Haji's cell phone are below:



Image 5: Photo recovered from Haji's phone showing Haji (on left in black sweatshirt) posing with two other known individuals wearing Scamily sweatshirts and armed with firearms.



Image 6: Photo recovered from Haji's phone showing Haji posing with U.S. currency and a firearm.



Image 7: Photo recovered from Haji's phone showing Haji in possession of U.S. currency and near at least four firearms, some with extended magazines and iPhone boxes on toilet.



Image 8: Photo on Haji's phone of a Glock 19 9mm firearm, consistent with the firearm recovered near Haji at the time of his arrest (without the extended magazine) and the firearm he admitted to brandishing during the letter carrier robbery on December 7.

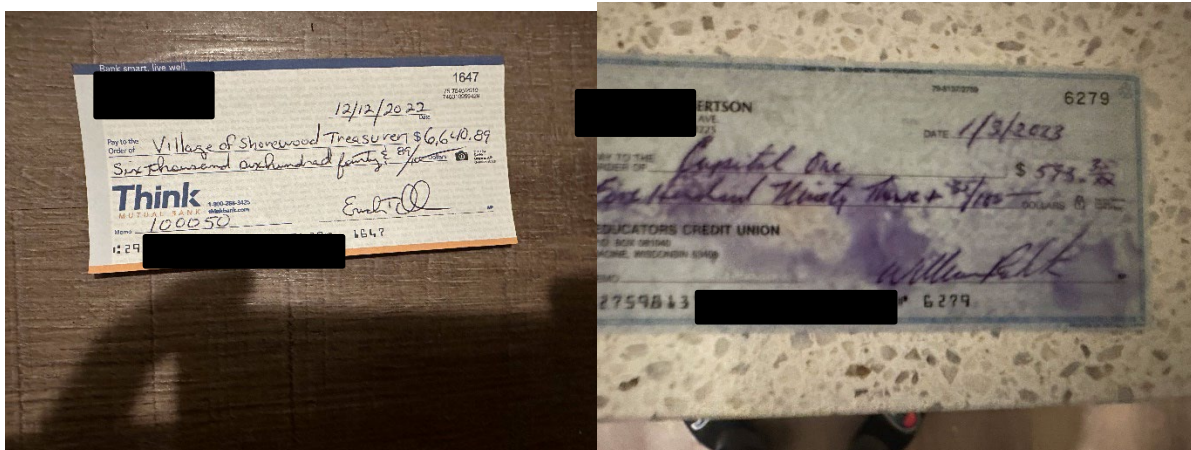


Image 9: Photos of stolen checks recovered from Haji's phone. One is dated 12/12/2022; the other is dated 1/3/2023.

The Facebook Messenger application was installed on Haji's phone. A review of Haji's conversations demonstrated his entrenchment in the overall criminal enterprise. Just a few examples are below, with Haji using the username "Scamily Sain."





IV. Conclusion

Based upon the foregoing and the submissions at the detention hearing, clear and convincing evidence reflects that Haji is an extreme danger to the community and he should remain detained pending trial.

Dated at Milwaukee, Wisconsin this 28th day of April, 2023.

Respectfully submitted,

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